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February 3, 2016

**By ECF and Email**

Hon. Andrew L. Carter, Jr.  
United States District Court  
Southern District of New York  
40 Foley Square, Room 435  
New York, New York 10007

Re: *United States v. Edward Durante, et al.* S4 15 Cr. 171 (ALC)

Dear Judge Carter:

On behalf of my client, Abida Khan, and with the consent of the government, I am writing to request an additional two week enlargement of time, from February 3, 2016 until February 17, 2016, to produce a financially responsible co-signor for Ms. Khan's bond, together with two modifications to the bond.

On January 13, 2016, Your Honor ordered Ms. Khan released pending trial, on the following conditions: that she submit to electronic monitoring in her home district, the District of Nevada, subject to a curfew; that she sign a personal recognizance bond in the amount of \$500,000, to be co-signed by two financial responsible persons; that she restrict her travel to the Districts of Nevada and New Jersey and to the Southern and Eastern Districts of New York; that she surrender her travel documents and make no new applications for such documents; and that she submit to strict pretrial supervision. Your Honor allowed Ms. Khan until January 27, 2016, to satisfy the conditions of her bond.

On January 26, 2016, with the consent of the government, I requested a one week adjournment, until today, within which to secure the required co-signors. I am writing, again with the consent of the government (AUSA Griswold), to request more time, until February 17, 2016, for Ms. Khan to satisfy the conditions of the bond, and to request two modifications to the bond. I have discussed with Ms. Griswold efforts Ms. Khan and I have made to secure financial responsible persons to sign the bond and obstacles we have encountered. As a result, Ms. Griswold has agreed, subject to the Court's approval, to reduce the size of bond from \$500,000 to \$200,000 and to require that the bond be co-signed by one financially responsible person, rather than two.

Ms. Khan is compliant with all aspects of her release, other than the securing of financially responsible co-signors. Ms. Khan has been subject to electronic monitoring with a curfew since on or about January 15, 2016, two days after her appearance in this district.

Hon. Andrew L. Carter, Jr.

February 3, 2016

Page 2

If Your Honor is inclined to grant this request, I respectfully ask that Your Honor memo endorse this letter below.

Respectfully submitted,



Joanna C. Hendon

So Ordered: \_\_\_\_\_  
HON. ANDREW L. CARTER, JR.

cc: AUSA Daniel S. Goldman  
AUSA Andrea M. Griswold